

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>SECURITIES AND EXCHANGE COMMISSION,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>ANTHONY MARSICO, ARTHUR P. PIZZELLO, JR., ROBERT QUATTROCCHI, AND TIMOTHY CAREY,</b>  <b>Defendants.</b>	<b>Civil Action No.: 1:25-cv-553</b>    <b>JURY TRIAL DEMANDED</b>
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**MOTION FOR ENTRY OF PARTIAL JUDGMENTS BY CONSENT  
AS TO DEFENDANTS ARTHUR P. PIZZELLO, JR. AND ROBERT QUATTROCCHI**

Plaintiff, the Securities and Exchange Commission (“SEC”), respectfully moves the Court to enter the proposed Partial Judgments (“Proposed Judgments”) as to Defendants Arthur P. Pizzello, Jr. (“Pizzello”) and Robert Quattrocchi (“Quattrocchi”) based on Pizzello’s and Quattrocchi’s signed consents. Copies of the Proposed Judgments are attached hereto as Exhibit 1 (Pizzello) and Exhibit 2 (Quattrocchi) and Pizzello’s and Quattrocchi’s consents to entry of the Proposed Judgments are attached as Exhibit 3 (Pizzello) and Exhibit 4 (Quattrocchi). In support of this motion, the SEC states as follows:

1. The SEC filed its Complaint against Defendants Pizzello and Quattrocchi on January 16, 2025. (Dkt# 2). The Complaint alleges that Pizzello and Quattrocchi each engaged in insider trading in violation of Section 10(b) of the Securities Exchange Act of 1934 [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

2. The SEC and Defendants Pizzello and Quattrocchi, in partial settlement of the SEC's claims, have agreed to the entry of the Proposed Judgments. In their Consents, Pizzello and Quattrocchi agree to the relief sought in the Proposed Judgments. (*See* Exs. 3 and 4).

3. The Proposed Judgments eliminate the need to litigate the merits of Pizzello's and Quattrocchi's liability and contain a conduct-based injunction permanently enjoining Pizzello and Quattrocchi from violations of each of the provisions of the federal securities law at issue in the Complaint.

4. The Proposed Judgments further provide that the monetary relief sought by the SEC – in the form of disgorgement, prejudgment interest, and civil penalties – shall be determined by the Court at a later date. The SEC anticipates moving for remedies as to Defendants Pizzello and Quattrocchi at a later stage of proceedings. For the purpose of that determination, the parties agree that the Court would accept the allegations in the Complaint as true. In SEC enforcement actions, Courts have routinely entered judgment based on this type of bifurcated settlement and have adopted the procedures described in the Consents and Proposed Judgments for the relief phase of proceedings. *See, e.g., SEC v. Williky*, 942 F.3d 389 (7th Cir. 2019); *SEC v. Zenergy Int'l, Inc.*, 2016 WL 5080423 (N.D. Ill. Sept. 20, 2016); *SEC v. Resources Planning Group, Inc.*, Case No. 12-cv-9509, Docket No. 51 (N.D. Ill. Sept. 29, 2014).

5. In the Consents, Defendants Pizzello and Quattrocchi agree that the SEC “may present the [Proposed] Judgment to the Court for signature and entry without further notice.” (Ex. 3, ¶ 15; Ex. 4, ¶ 14).

6. Entry of the Proposed Judgments will conserve judicial resources, streamline the issues in this litigation, and save the SEC and Defendants Pizzello and Quattrocchi the time and expense of continued litigation on the issue of liability.

**WHEREFORE**, for the reasons cited above, the SEC respectfully requests that the Court grant this motion and enter the Proposed Judgments.

Dated: January 16, 2025

Respectfully submitted,

By: /s/ Ashley E. Dalmau Holmes  
UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION  
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### **CERTIFICATE OF SERVICE**

On January 16, 2025, I electronically filed the foregoing document with the clerk of court for this U.S. District Court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I have further emailed this filing to the following parties on this Court’s docket:

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*/s/ Ashley E. Dalmau Holmes*